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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

KEVIN K. SHANAHAN, MICHAEL
NEWTON, JAMES SHOWFROTH, AND
ROSEMARY KERRANE, as agent in fact and
durable power of attorney for ROBERT H.
SPINNEY, individually and on behalf of all
others similarly situated,

Plaintiffs,

v.

PERRY JOHNSON & ASSOCIATES, INC.,
NORTHWELL HEALTH, INC., SALEM
REGIONAL MEDICAL CENTER, and COOK
COUNTY HEALTH,

Defendants.

CASE NO.: 2:23-cv-01947-RFB-DJA

**STIPULATION TO EXTEND TIME FOR
DEFENDANTS PERRY JOHNSON &
ASSOCIATES, INC. AND NORTHWELL
HEALTH, INC. TO RESPOND TO
PLAINTIFFS' AMENDED COMPLAINT**

(FIRST REQUEST)

Plaintiffs Kevin K. Shanahan, Michael Newton, James Showfroth, and Rosemary Kerrane, as agent in fact and durable power of attorney for Robert H. Spinney, individually and on behalf of all others similarly situated ("Plaintiffs"), and Defendants Perry Johnson & Associates, Inc. ("PJ&A") and Northwell Health, Inc. ("Northwell" and, collectively with PJ&A, "Defendants") stipulate and respectfully request under Local Rule IA 6 that this Court extend the time for Defendants to respond to Plaintiffs' amended complaint in the above-captioned action (the "Amended Complaint") until **March 1, 2024**.

1 Plaintiff filed the initial complaint on November 22, 2023, and served PJ&A and Cook
2 County Health on November 30, 2023. Northwell waived service on November 29, 2023. On
3 December 4, Plaintiffs filed the Amended Complaint, adding Salem Regional Medical Center
4 (“Salem”) as a party. Salem was served on December 20, 2023.

5 On December 8, 2023, Plaintiff filed a Motion for Transfer of Actions to United States
6 District Court for the District of Nevada for Coordinated or Consolidated Pretrial Proceedings
7 Pursuant to 28 U.S.C. § 1407 (the “Motion”) in the Judicial Panel on Multidistrict Litigation
8 (“JPML”). *See In re Perry Johnson & Associates Medical Transcription Data Security Breach*
9 *Litigation*, Case MDL No. 3096, ECF No. 1 (December 8, 2023). The motion directly concerns the
10 potential consolidation and transfer of at least forty-five related putative class action complaints.
11 The JPML heard oral arguments on the Motion on January 25, 2024.

12 The Defendants’ responses to the Complaint are currently due by January 29, 2024.

13 This extension is necessary to allow the JPML sufficient time to evaluate the various related
14 actions, twenty-one of which have been filed in this District alone. A list of these related actions is
15 included as Appendix A. As nearly every party—including Plaintiff and Defendants—has agreed
16 that centralization is proper, the primary question for the JPML is *where* to centralize the cases, not
17 *whether* to centralize them.

18 Plaintiff and the Defendants consent to this request. This is the first request for extension of
19 time for this deadline for PJ&A and Northwell. The parties respectfully submit that there is good
20 cause for this extension and the requested extension is not for the purpose of delay.

21 ///

22 ///

23 IT IS SO STIPULATED.

1 Dated: January 26, 2024.

2 SNELL & WILMER

3 By: /s/ Alex L. Fugazzi

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Health, Inc.
pro hac vice forthcoming

Dated: January 26, 2024.

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Dated: January 26, 2024.

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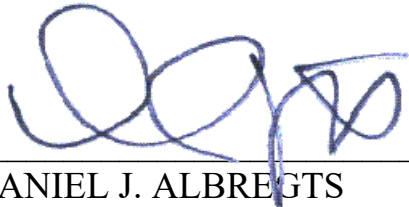
*Counsel for Defendant Perry Johnson &
Associates, Inc.*

ORDER

Good cause appearing, IT IS HEREBY ORDERED that the Parties' stipulation is GRANTED. Defendants shall have up to and including **March 1, 2024** to respond to Plaintiffs' complaint.

IT IS SO ORDERED.

DATED: January 29, 2024.

A handwritten signature in blue ink, appearing to read 'D. Albregts', is written over a horizontal line.

DANIEL J. ALBREGTS
UNITED STATES MAGISTRATE JUDGE

Appendix A

Related Cases Filed Against Perry Johnson & Associates, Inc. & Northwell Health, Inc. as of
January 25, 2024

1. *Abdaljalil v. Perry Johnson & Associates, Inc.*, No. 2:24-cv-00025 (D. Nev. filed Jan. 4, 2024)
2. *Belov et al v. Northwell Health, Inc. and Perry Johnson & Associates, Inc.*, No. 2:23-cv-08583 (E.D.N.Y. filed Nov. 17, 2023)
3. *Belov et al v. Perry Johnson & Associates, Inc.*, No. 2:23-cv-01925 (D. Nev. filed Nov. 20, 2023)
4. *Bishop et al v. Bon Secours Mercy Health, Inc., and Perry Johnson & Associates, Inc.*, No. 3:23-cv-00385 (S.D. Ohio filed Dec. 22, 2023)
5. *Brewster v. Northwell Health, Inc. and Perry Johnson & Associates, Inc.*, No. 2:23-cv-08627 (E.D.N.Y. filed Nov. 20, 2023)
6. *Brown v. Perry Johnson & Associates, Inc., and Northwell Health, Inc.*, No. 2:24-cv-10037 (E.D. Mich. filed Jan. 5, 2024)
7. *Carino et al. v. Northwell Health Inc. and Perry Johnson & Associates, Inc.*, No. 2:23-cv-02090 (D. Nev. filed Dec. 19, 2023)
8. *Carter v. Cook County Health and Perry Johnson & Associates, Inc.*, No. 2:23-cv-01866 (D. Nev. filed Nov. 13, 2023)
9. *Colon et al v. Perry Johnson & Associates, Inc.*, No. 2:23-cv-01910 (D. Nev. Filed Nov. 20, 2023)
10. *Cook v. Northwell Health, Inc. and Perry Johnson & Associates, No. 23-000859* (N.Y. Sup. Ct., Nassau County filed Nov. 30, 2023)
11. *Davis v. Perry Johnson & Associates, Inc.*, No. 2:23-cv-01932 (D. Nev. Filed Nov. 21, 2023)
12. *Faivre v. Perry Johnson & Associates, Inc., Northwell Health, Inc., and Cook County Health*, No. 2:23-cv-01926 (D. Nev. filed Nov. 20, 2023)
13. *Gerber v. Northwell Health, Inc. and Perry Johnson & Associates, Inc.*, No. 2:23-cv-08467 (E.D.N.Y. filed Nov. 14, 2023)
14. *Gill v. Perry Johnson & Associates, Inc. and Northwell Health, Inc.*, No. 2:23-cv-01851 (D. Nev. filed Nov. 10, 2023)
15. *Green v. Perry Johnson & Associates, Inc.*, No. CVI-23-17247 (Toledo Municipal Court, Lucas County Ohio filed Dec. 12, 2023)
16. *Gregg v. Perry Johnson & Associates, Inc. and Northwell Health, Inc.*, No. 2:23-cv-01987 (D. Nev. filed Nov. 30, 2023)
17. *Heitzner v. Northwell Health, Inc. and Perry Johnson & Associates, Inc.*, No. 16119/2023 (N.Y. Sup. Ct., New York County filed Nov. 15, 2023)
18. *Hinda v. Northwell Health, Inc. and Perry Johnson & Associates, Inc.*, No. 2:23-cv-09445 (E.D.N.Y. filed Dec. 21, 2023)

19. *Horsley et al v. Bon Secours Mercy Health, Inc., and Perry Johnson & Associates, Inc.*, No. 1:23-cv-00835 (S.D. Ohio filed Dec. 21, 2023)
20. *Hvidsten et al. v. Northwell Health, Inc.*, No. 2:23-cv-08538-RPK-ARL (E.D.N.Y. filed Nov. 16, 2023)
21. *H.Z. et al v. North Kansas City Hospital Auxiliary, Perry Johnson & Associates, Inc., Perry Johnson & Associates Coding Holding, Inc., and Perry Johnson & Associates Staffing Holding, Inc.*, No. 24CY-CV00708 (Cir. Ct. of Clay County, Missouri filed Jan. 17, 2024)
22. *Jackson v. Board of Trustees of North Kansas City Hospital, Meritas Health Corporation and Perry Johnson & Associates, Inc.*, No. 24CY-CV00519 (Cir. Ct. of Clay County, Missouri filed Jan. 12, 2024)
23. *Jon v. Perry Johnson & Associates, Inc., and Northwell Health, Inc.*, No. 2:24-cv-10100 (E.D. Mich. filed Jan. 12, 2024)
24. *Kaufman v. Northwell Health, Inc. and Perry Johnson & Associates, Inc.*, No. 2:23-cv-01935 (D. Nev. filed Nov. 21, 2023)
25. *Kay v. Perry Johnson & Associates, Inc. and Bon Secours Mercy Health, Inc., d/b/a Mercy Health*, No. 2:24-cv-00115 (D. Nev. filed Jan. 16, 2024)
26. *Kimber v. Cook County Health & Hospitals System and Perry Johnson & Associates, Inc.*, No. 2023-CH-09293 (Ill. Cir. Ct., Cook County filed Nov. 7, 2023)
27. *Kurtev et al v. Cook County Health & Hospitals System and Perry Johnson & Associates, Inc.*, No. 2:23-cv-01905 (D. Nev. filed Nov. 17, 2023)
28. *Jerome v. Northwell Health*, No. 2:23-cv-8624 (E.D.N.Y. filed Nov. 20, 2023)
29. *Levitt v. Northwell Health Inc. and Perry Johnson & Associates, Inc.*, No. 2:23-cv-01892 (D. Nev. filed Nov. 16, 2023)
30. *Lowery v. Northwell Health, Inc. and Perry Johnson & Associates, Inc.*, No. 2:23-cv-01857 (D. Nev. filed Nov. 13, 2023)
31. *Marconi et al. v. Northwell Health, Inc. and Perry Johnson & Associates, Inc.*, No. 2:23-cv-08638 (E.D.N.Y. filed Nov. 21, 2023)
32. *Martin v. Cook County Health & Hospitals System and Perry Johnson & Associates, Inc.*, No. 2023-CH-09558 (Ill. Cir. Ct., Cook County filed Jan. 19)
33. *Mayo et al. v. Northwell Health Inc. and Perry Johnson & Associates*, No. 2:23-cv-08517 (E.D.N.Y. filed Nov. 16, 2023)
34. *O'Neill et al v. Perry Johnson & Associates, Inc., and County of Cook, Illinois*, No. 2:23-cv-01964 (D. Nev. filed Nov. 28, 2023)
35. *O'Rourke v. Northwell Health, Inc. and Perry Johnson & Associates, Inc.*, No. 2:23-cv-01880 (D. Nev. filed Nov. 14, 2023)
36. *Rodriguez et al. v. Northwell Health Inc. and Perry Johnson & Associates, Inc.*, No. 2:23-cv-01874 (D. Nev. filed Nov. 14, 2023)

- 1 37. *Ruderman et al. v. Northwell Health Inc. and Perry Johnson & Associates, Inc.*, No. 2:23-cv-
2 02014 (D. Nev. filed Dec. 6, 2023)
- 3 38. *Sept et al v. Perry Johnson & Associates, Inc.*, No. 2:23-cv-01983 (D. Nev. Filed Nov. 30,
4 2023)
- 5 39. *Shanahan et al. v. Perry Johnson & Associates, Inc., Northwell Health, Inc., and Cook County*
6 *Health*, No. 2:23-cv-01947 (D. Nev. filed Nov. 22, 2023)
- 7 40. *Slotchiver v. Perry Johnson & Associates, Inc.*, No. 2:24-cv-00155 (D.S.C. Filed Jan. 10,
8 2024)
- 9 41. *Stone et al v. Salem Community Hospital and Perry Johnson & Associates, Inc.*, No. 4:23-cv-
10 02421 (N.D. Ohio filed Dec. 20, 2023)
- 11 42. *Sullivan v. Perry Johnson & Associates, Inc., and Northwell Health, Inc.*, No. 2:24-cv-10098
12 (E.D. Mich. filed Jan. 12, 2024)
- 13 43. *Tudda v. Northwell Health, Inc. and Perry Johnson & Associates, Inc.*, No. 618932/2023 (N.Y.
14 Sup. Ct., Nassau County filed Nov. 20, 2023)
- 15 44. *Vasquez v. Northwell Health, Inc. and Perry Johnson & Associates, Inc.*, No. 2:23-cv-08544-
16 LDH-AYS (E.D.N.Y. filed Nov. 16, 2023)
- 17 45. *Vetere v. Northwell Health, Inc. and Perry Johnson & Associates, Inc.*, No. 2:23-cv-01900 (D.
18 Nev. filed Nov. 17, 2023)

14 4855-9099-0240